

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

CRAIG CUNNINGHAM, on behalf himself	)	
And of all other persons similarly situated,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CASE NO. 1:19-cv-02547
	)	
PENN LLC, d/b/a PULSETV.COM	)	
	)	
Defendant.	)	
	)	

**DEFENDANT’S UNOPPOSED MOTION  
TO EXTEND TIME TO RESPOND TO COMPLAINT**

Defendant PENN, LLC (“Penn”), through their counsel, Peter C. Morse, hereby moves this court to grant an extension of thirty (30) days for Penn to file its response to Plaintiffs’ Complaint, and in support of this motion states as follows:

1. Plaintiffs filed their Complaint in this Court on April 15, 2019.
2. Penn was served with the Summons and Complaint on April 18, 2019.
3. Penn’s response to Plaintiffs’ Complaint is currently due on May 9, 2019. Thus, the time within which Penn must file its responsive pleading has not yet expired.
4. Penn needs additional time to prepare its response to the Complaint. In addition, Penn is working on gathering internal documents including call records which will be used in settlement discussions and/or later discovery.
5. Plaintiffs’ counsel has agreed to this extension of thirty (30) days, up to and including June 8, 2019, in which Penn must file its response to Plaintiffs’ Complaint.
6. This is the first request for an extension of time filed by Penn.

Respectfully submitted this 9<sup>th</sup> day of May, 2019.

By: /s/ Peter S. Morse  
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